

# PSJ3

## Exhibit 680

1 UNITED STATES DISTRICT COURT  
2 FOR THE NORTHERN DISTRICT OF OHIO  
3 EASTERN DIVISION

4 \*\*\*\*\*

5 IN RE: NATIONAL MDL No. 2804  
6 PRESCRIPTION OPIATE  
LITIGATION Case No.  
1:17-MD-2804

7 \*\*\*\*\*

8 THIS DOCUMENT RELATES TO Hon. Dan A. Polster  
9 ALL CASES

10 \*\*\*\*\*

11 HIGHLY CONFIDENTIAL - SUBJECT TO FURTHER  
12 CONFIDENTIALITY REVIEW  
13 VIDEOTAPED DEPOSITION OF CRAIG SCHIAVO

14  
15 Thursday, January 17th, 2019  
16 8:06 a.m.

17  
18 Held At:  
19 Omni Hotel  
20 One West Exchange Street  
21 Providence, Rhode Island

22  
23 REPORTED BY:  
24 Maureen O'Connor Pollard, RMR, CLR, CSR

1           A.     In 2012, 2013, I don't recall.

2     BY MR. ELSNER:

3           Q.     Is it done today?

4                   MS. MILLER:   Same objection, and  
5     object to form.

6           A.     I'm not familiar with the audit  
7     process and everything that is audited.

8     BY MR. ELSNER:

9           Q.     Okay.   It says on Page 8 of the  
10    PowerPoint under "DEA Reporting Requirements" at  
11    the very top, it says "CVS is obligated to  
12    report orders determined to be Suspicious that  
13    were placed to our Distribution Centers," and  
14    "placed to our distribution centers" is  
15    underlined and in bold, correct?

16          A.     I see that it is underlined, and it  
17    appears that at least part of it is in bold.

18          Q.     Okay.   And then if you look down to  
19    the third bolded item, it reads that "Orders  
20    that are placed to an Outside Vendor that we  
21    identify as an order deviating from the normal  
22    size, frequency, and/or buying pattern and  
23    deemed to not be for legitimate purposes or are  
24    at the risk of being diverted are not required

1 to be reported to the DEA."

2 Did I read that correctly?

3 MS. MILLER: Object to form.

4 A. That's what it says, but I don't know  
5 how we would identify an order placed to an  
6 outside vendor deviating from normal size,  
7 frequency, but I don't believe that part of our  
8 process monitoring specific orders to the OV  
9 when they are placed.

10 BY MR. ELSNER:

11 Q. So I guess my first question is, does  
12 CVS have a system in place to monitor the orders  
13 that are being placed by its pharmacies, whether  
14 from the distribution center or to outside  
15 vendors for controlled substances?

16 MS. MILLER: Object to form.

17 A. I know that CVS monitors orders of  
18 controlled substances.

19 BY MR. ELSNER:

20 Q. From its pharmacies?

21 A. From its retail pharmacies.

22 Q. Okay. And it monitors them for  
23 suspicious size, frequency, is that right?

24 MS. MILLER: Object to form.